



Minneapolis: Business Made Simple

Report and Recommendations

The project

The Mayor requested the City Attorney's Office to conduct a review of City business regulation with the goal of identifying strategies for simplifying and streamlining the process for businesses to open, expand and thrive in the City.

The initial focus of the review has been on City regulations and approval processes that impact smaller businesses, particularly in the food sector. As the project continues, regulation and processes impacting other business sectors and development projects will be analyzed.

This project overview has three sections:

- Improvements we've already made – page 3
- What we've learned from customers – page 5
- Recommendations for additional improvements – page 6

Why we need to simplify

Minneapolis is a great place to start and run a business, but sometimes obsolete or unnecessary regulations can get in the way of opening or expanding a successful business. That's why the City is taking a close look at all of its business regulations to find ways to make Minneapolis even better for businesses to start and grow.

Minneapolis Business Made Simple is an effort to reduce barriers to investment in our city. In order to keep fueling our significant growth, the City needs to foster investment and avoid unreasonable hurdles for businesses. This can mean simplifying some City rules or eliminating them altogether. At the same time, smart regulation that's clear and easier to follow will help businesses with compliance, saving them, and City staff, time and money. Minneapolis regulates many types of businesses in the city in order to protect consumers and keep them safe. But over the years, many ordinance changes and additions have been made in response to individual problems leaving us with a network of regulations that can sometimes be complex and cumbersome. Also, as businesses and economic conditions change, some older regulations are no longer necessary and can stand in the way of new investment.

Many City departments have a role to play in regulating businesses, whether it's by issuing business licenses, performing food safety inspections, or enforcing rules related to transportation, alcohol sales, or zoning. That's why it's important for the City to take a broad look at its regulations that affect business, so we can find opportunities to streamline and improve those processes. This is also an opportunity to look at other improvements in the way we work with businesses to make the City more customer-friendly.

We are also a City that takes pride in our diversity and the many small businesses owned by people who've come to Minneapolis from around the world. To achieve long term, sustainable economic growth, we need to ensure that everyone who wishes to invest in a dream or an idea has the opportunity to do so. That requires us to not only streamline regulations, but also make it easier to do business with the City for people whose first language is not English. It can also mean expanding other ways the City can support entrepreneurs through specialized small business assistance or by assigning a facilitator to assist in navigating necessary steps in the City's business review and approval processes.

Improvements we've already made

A little over ten years ago, the City undertook a major review and reform of its business development processes. This led to the creation of Business Development Review and the Business Customer Service Center, which created a single location for business customers and contractors to access the City's development, licensing and construction review processes.

The City has continued to improve on those reforms, such as:

1. **Liquor Reform.** Recently, changes to the City Charter and to local liquor regulations have removed food to liquor ratios that burdened small food establishments serving wine and beer in the City.
2. **Health Department.** Ordinances relating to farmers markets have been revised, eliminating unnecessary restrictions and requirements. Training about ethnic and culture-specific food preparation was recently provided to department staff who do inspections of these businesses. The department has also taken steps to improve inspector consistency through peer reviews, new senior inspector positions and ride-alongs with state food inspectors in other jurisdictions.
3. **Business Licensing.** All Business License applications are now accessible online so that customers can begin the process at the time of their choosing. Separate license classifications for groceries, "grocerias" and specialty food stores have been eliminated. Business Licensing also meets monthly with neighborhood business associations to gain advice, improve services and share information.
4. **Mobile Food Vendors.** Legalized by the City in 2010, recent improvements have taken place making these entry-level businesses more accessible to new entrepreneurs. The areas where food trucks are allowed to operate have been expanded, thus increasing the potential for success. The City currently has 81 licensed food trucks and several food truck operators have transitioned to a bricks and mortar restaurant.
5. **Construction Code Services.** A multi-disciplinary building code inspector position was created so that a single inspector can conduct the final construction inspection.
6. **Transportation.** The City created a license for people who want to operate pedicabs in town. Today, there are 105 pedicabs licensed in Minneapolis. License changes also recently took place for rideshare transportation services like Uber and Lyft. Minneapolis is one of the first cities in the country to develop these rules, which keeps our city on top of emerging uses of technology while continuing to focus on the safety of passengers.

7. **Reducing City Processing Times.** Through a business process improvement project, Business Licensing reduced the average time to obtain a liquor license from 65 days to 38 days. Development Review cut preliminary review times from 20 days to 10 days by providing for concurrent review of plans by Zoning and Construction Code Services.

8. **Zoning.** The City revised the regulations in the Zoning Code governing the number of off-street parking and loading spaces that must be provided when establishing a new business. The new regulations offer greater flexibility related to the minimum number of parking spaces that must be provided with new development, while eliminating a parking requirement entirely from the downtown zoning districts. This change eliminated the time, expense, and uncertainty involved in obtaining a parking variance in many cases and also increased the feasibility of the adaptive re-use of existing, older buildings. The City expanded on this approach in 2013 when it adopted the Nicollet/Franklin Pedestrian Oriented Overlay District, which eliminated minimum parking requirements for commercial uses in this key area.

What we've learned from customers

Stakeholder Listening Sessions:

Over the fall of 2014, the Mayor conducted five listening sessions in different locations throughout the City with over 40 businesses representing a variety of small and medium sized businesses. The Mayor also met with the City's Business Technical Assistance Program providers. The business owners communicated their experiences in working with the City. They shared frustrations and impediments as well as positive experiences.

While businesses shared many positive comments, the most common criticisms include:

1. **Customer Service Shortfall.** Business owners reported that they often felt they were not treated as "customers" in interactions with the City and that staff would tell them what was wrong with plans, but would not suggest alternatives that would be permissible. Feedback also included assertions that City staff operate in "silos" and do not have the "big picture" in mind.
2. **Inconsistent/ Conflicting Directives.** Owners shared that at times staff provided inconsistent or even conflicting information and/or directives. One frequent example was grease traps in food businesses. One inspector may require them while an inspector from a different division may direct their removal.
3. **License Application forms are too burdensome.** Customers complained of the volume of information required.
4. **Unnecessary, obsolete regulatory requirements.** Separate licenses are required for things such as juke boxes or laundry pick-up stations at a convenience store. Requirements to hold special events at existing businesses are confusing and burdensome.
5. **Tenants bear burden of building code requirements.** Even small renovations to a building can trigger significant requirements for improvements to bring the whole building up to new code standards. Customers lacked knowledge of this possibility and did not provide for it in leases with landlords with the result that the customer (a tenant) was burdened with the substantial, unanticipated costs of bringing a full building into code compliance.
6. **Sewer Access Charges (SAC).** One of the most common complaints from businesses related to sewer access charges imposed by the Metropolitan Council. The charges are described as exorbitant and unfair. The application form requires full architectural drawings even if floor plans are not changing. Because the City is liable for any unpaid SAC charges, a SAC determination from the Metropolitan Council is required prior to the issuance of any permits even in situations where it is likely that no additional SAC fee will be imposed. This causes delays in the process for customers.

Recommendations for additional improvements

Summary of Key Needs for Smaller Businesses:

Smaller business operators need:

- clear, easy-to-follow guidance
- complete picture of what will be needed, the estimated timelines, process and charges
- proactive assistance, including examples of what the city requires and is looking for so that the customer can “get it right” on the first try avoiding delays and the expense of revising plans
- facilitators assigned at the start of process (one person to call) who can guide them through each step of the process and help facilitate

Summary of Recommendations:

Based on feedback from small businesses, review of City ordinances and input from the involved departments, we have identified the following as key goals for moving forward on improvements:

GOAL 1:	Simplify and Streamline Page 7
GOAL 2:	Provide Special Assistance for Small Businesses Page 10
GOAL 3:	Make Things Easier and Faster Page 12
GOAL 4:	Improve Coordination/ Eliminate Inconsistency Page 15
GOAL 5:	Deliver Better Customer Service and Plan for Continuous Improvement Page 17

GOAL 1: SIMPLIFY and STREAMLINE

- **Develop Simple Comprehensive Checklists Outlining the full Process for Common Types of Smaller Businesses**

- Businesses must be able to develop a clear timeline and budget, along with staging the steps of their business process according to that timeline.
- Simple, comprehensive checklists should be developed for the most common types of businesses.
 - The checklists should:
 1. include all steps in the governmental approval process – including state and Metropolitan Council (SAC review) steps, along with requirements of Zoning, Construction Code Services, Public Works, Environmental Health and Business Licensing
 2. be written in plain language and translated into multiple languages
 3. include anticipated average timelines for different steps in the process and fees

- **Enterprise Land Management System (ELMS) – Achieve 2 Goals in 1 Process:**

- **Design Customer Interface to be a User-Friendly one-stop shop for business customers;**

AND

- **Simplify Application and Information Materials**

The City is in the process of implementing a new enterprise land management system (ELMS) that, for the first time, will provide one consolidated electronic data system for all of the departments at the City engaged in development review and business licensing, enforcement and inspections.

ELMS when fully implemented will have a customer interface that will allow businesses to submit development plans, permit applications and license applications on-line.

The customer interface design phase will begin later this spring. This process can be utilized to spearhead a plain language review and development of the checklist and plain language materials identified above.

Recommendations for the Customer Interface Design Process:

The process for designing the Customer Portal for ELMS can achieve two goals at the same time:

- Simplify materials, application forms and create easy-to-follow checklists; and
- Create a User-friendly one-stop shop on-line portal.

In order to achieve both goals, the customer portal design team should add representatives with the following skill sets:

- Plain Language Writing; and
 - Business Process Improvement
- **Continue to Eliminate and Consolidate Types of Business Licenses:**

For example:

Eliminate licenses for:

- Jukeboxes
- Milk Delivery Trucks
- Ice Producers/ Ice Peddlers
- Laundry Pick-up Station
- Nut Vending Machine

Business Licensing has expressed interest in continuing to consolidate license types. For example, in the last quarter of 2014, certain categories of grocery store licenses were consolidated, eliminating separate license types for “groceries” and “grocery specialty stores.”

The ELMS system can facilitate this process through the design of the customer interface so that the customer sees broad categories of licenses – such as “food,” for the customer to click on. The interface can include a simple fee calculator with a graduated fee structure that fairly distinguishes between businesses based on the City’s costs of regulation and inspection.

- **Simplify License Application Requirements:**

A review should be conducted of information and background check requirements for business licenses to determine if certain of the more burdensome requirements can be narrowed or eliminated.

Example: Applications for liquor licenses and grocery stores currently include a lengthy financial and background section along with a background investigation requirement. While there may be circumstances where a broader background check may be warranted and advisable, it may also be possible to restrict these more in-depth reviews to a smaller category of applicants so that the process is less burdensome.

- **Other Opportunities:**

- **Review Temporary Event Permits:** Particularly with the on-line capabilities of ELMS, it is likely that the process of obtaining a temporary event permit, particularly for events occurring in existing businesses, can be made easier and simpler.

Businesses shared frustration in trying to host simple neighborhood oriented events in their businesses, explaining that the requirements were confusing and seemed overly burdensome.

- **Review Parking Requirements:** Additional areas of the City should be studied for the potential relaxation or elimination of parking requirements necessary to establish a new commercial business. This change would achieve significant cost savings for small business entrepreneurs in areas of the City well-served by public transit options and would also expand the number of existing buildings and sites that could be adapted to a new business use.
- **Review Limitations on Live Musicians in Licensed Businesses:** In recent years, there have been several reforms of City regulation to relax restrictions on musical entertainment in licensed liquor establishments. There remain, however, restrictions on the number of musicians allowed depending on class of the alcohol license, regardless of whether the music is acoustic or amplified. These requirements could be reviewed to place restrictions on noise levels instead of by numbers of musicians.

GOAL 2: PROVIDE SPECIAL ASSISTANCE FOR SMALL BUSINESSES

- **Small Business Facilitator/ Navigator:** Create a Development Coordinator – Facilitator/ Navigator position for smaller businesses and assign the coordinator to prospective customers on their first visit to the Customer Service Center instead of waiting until the customer has plans to submit. With one person, one email and one phone number to contact, smaller and less sophisticated business entrepreneurs will have an easier time navigating the City system.
- **Improve Multi-lingual capabilities:** There is a need to improve language translation capabilities, particularly at the Customer Service Center. The translation phone line services are less than ideal because there is no ability for the translator on the phone line to see the documents or plans that are under discussion. In addition, the translators do not necessarily have a background in development-related matters. Consideration should be given to developing multi-lingual development coordinator positions.
- **Guidance for New Entrepreneurs:** Develop specialized information materials and helpful guidance for small businesses.

Example: New business operators could benefit from guidance on matters such as what to consider before signing a lease. During the listening sessions, businesses shared stories of problems that could be alleviated by providing new entrepreneurs with guidance, such as the following questions to ask before signing a lease:

Zoning:

- Q: Does the Zoning code allow the type of business you are considering?

Building Code Questions:

- Q: Is the building up to current code requirements?
- Q: If not, will current code requirements be triggered with changes you are contemplating?
- Q: How much will this cost?

Q: Who will be responsible for these changes – you or your landlord?

Timeline: Know your timeline for getting your business up and running and obtaining approvals, financing, etc., so that you are not paying rent for an unexpected length of time.

- **Explore Additional Small Business Resources:** Consider additional services that could be offered at the Customer Service Center through business, community or other resources, such as the City's Business Technical Advisory Program, chambers of commerce, business associations and the like. For example, a volunteer mentor corps of retired business executives could be formed and offered to small business customers.

GOAL 3: MAKE THINGS EASIER and FASTER

- **Shorten the Timeline:**

- **Expand List of “Permitted Uses:”** Continue to explore methods to reduce timelines for City business approvals by continuing to expand the list of “permitted uses” and items subject to administrative approvals, eliminating the delay of waiting to go through a Council process for routine types of approvals.

Examples: Several uses have been moved from “conditional” to “permitted,” including exercise and health facilities, secondhand goods stores, and consignment clothing stores. This change eliminates the often costly, two month public hearing process involved in obtaining a conditional use permit (“CUP”). Additional uses should be reviewed for a similar transition to “permitted” status.

Without the need to obtain a CUP, many new businesses often only need to submit a site plan review application. The Zoning Code currently provides for the administrative review of a site plan application when certain criteria are met. Those criteria should be reviewed to determine the feasibility of increasing the number of site plan applications that can be reviewed administratively by staff, rather than through a public hearing process. This shortens the approval timeline, allowing a business to open more quickly.

- **Continue to Explore Efficiencies through Concurrent Reviews and Combined/ Multi-disciplinary Inspections:** Continue to improve processes to reduce timelines for City approvals through ongoing review :

Examples: When the City’s new Enterprise Land Management System (ELMS) is launched, it will allow for concurrent preliminary plan review by Zoning, Public Works and Regulatory Services, saving time for customers and providing one coordinated response for customers that will be accessible on-line.

Code Construction Services recently negotiated a multi-disciplinary Senior Inspector position so that only one inspector is needed to conduct a final review before issuance of a certificate of occupancy.

- **Protocol for Requiring Architect-signed Plans:**

A uniform protocol needs to be developed to govern staff discretion in requiring architect-signed plans.

The state building code dictates that architect-signed plans are required in a number of circumstances. There are situations, however, where City staff has discretion whether to

require architect-signed plans. Architect–signed plans increase the cost for the customer and the City should have a uniform protocol for imposing such a requirement when it is not required by the building code.

- **Simplify the List of Requirements for Issuing a Certificate of Appropriateness under Historic Preservation Ordinance:**

City ordinances (Section 599.350) govern the factors for issuing a Certificate of Appropriateness to allow alteration of a property in a historic district, a nominated property or a designated landmark. This section contains at least 13 different factors, some of which are overlapping and/or could be made more clear. This section could be simplified, making it easier to understand and administer without compromising historic protections and review authority.

- **Offer Guides with Examples of What *IS* Desired by the City:**

Community Planning can help businesses save time and money through the development review process by providing materials showing examples of what the City would approve and is desirable for different types of common remodeling and other construction related projects.

For example, the **Great Streets Façade Design Guide** (http://www.minneapolismn.gov/www/groups/public/@cped/documents/webcontent/convert_286603.pdf) provides a number of illustrations of desired improvements. This has been cited by business customers as a very helpful resource. These examples help guide businesses in what types of things are likely to be approved, avoiding the need for costly redoing of designs and plans.

One business shared the experience of having to go through numerous sets of drawings signed by a landscape architect before a design for a café’s surface parking lot was approved. The numerous revisions of the plans cost the business both money and time. A guide with examples of desired landscaping treatments for a business’ parking lot in a neighborhood commercial node (a common type of facility) might have helped avoid these frustrating expenses and delays.

The fear of creating a cookie cutter look to the City can be addressed by offering several acceptable alternatives and making clear that these are only possible alternatives, not the only allowed designs.

- **Coordinate/ Combine Annual Inspections:** Consider options to combine and coordinate annual inspections instead of staggering them throughout the year.

If being required to pay all annual fees at one time is a burden, the City could explore options for a payment plan to soften the impact.

- **Fees and Billings:** A review of business license fees is already in process independent of this project. The method of billing business customers for fees and whether and how to charge for individual inspection services should be evaluated. For example, instead of billing as it currently does for each individual service, the City could bundle certain charges into an annual license fee.
- **Sewer Access Charges:** A policy group should review options for reducing the burden of Metropolitan Council Sewer Access Charges (SAC) on City businesses.

The structure of SAC is that the City is liable for SAC charges that are not paid by businesses. As a result, receiving a determination of SAC fees and payment of any fees owing is a condition of the City proceeding with a review of plans and the issuance of permits and licenses.

Some recent improvements have included an agreement between the City and the Metropolitan Council that allows for a business to enter into a payment schedule for SAC fees under certain circumstances. In addition, the City now assists businesses in collecting documentation of historic credits for a property. Despite this assistance, however, SAC charges continue to be a significant area of frustration and a financial burden for small businesses.

Even without changes to the SAC fee structure, there are some minor improvements that could be achieved, such as:

- Making sure businesses are aware that the City can assist at least with collecting information and documentation on SAC credit history and make sure the City is doing a thorough job in providing this assistance;
- Explore the possibility of negotiating a “Safe Harbor” agreement with the Metropolitan Council outlining certain scenarios where it is highly unlikely that any additional SAC fee would be owed – for example, repairs that don’t add seating capacity or change a floor plan – where the City could dispense with requiring the business to seek a SAC determination;
- Explore options with the Metropolitan Council to consider alternatives to its requirement that full architectural plans be submitted with all SAC applications even if floor plans are not changing. Many tenants do not necessarily have access to full plans and the requirement in and of itself can impose a significant burden on small businesses.

GOAL 4: IMPROVE COORDINATION/ ELIMINATE INCONSISTENCY

- **Improve Consistency:** Develop and implement strategies to increase consistency between staff within divisions and between departments. Inspection findings should not vary significantly from one inspector to the next.

Example: Environmental Health has recently taken several steps to improve consistency in their division: (1) A senior inspector position was created with responsibility for reviewing all reports to ensure consistency; (2) A peer review process was added where inspectors perform joint inspections and review each other's reports; and (3) inspectors will do ride-alongs with state inspectors in St. Paul to make sure that there is uniformity across jurisdictions in enforcing statewide code requirements.

- **Inter-Departmental Work Group to Resolve Differences, Develop Strategies for Continuous Improvement:** An inter-departmental work group needs to be developed to identify and resolve areas of inconsistency within divisions and between departments. The group should also be tasked with responsibility to identify the most common types of problems found by inspectors and develop methods to aid businesses to prevent common errors.

Businesses shared examples of receiving contradictory directives from different inspectors. A commonly cited example relates to grease traps – businesses may be told to install a grease trap by one set of inspectors while inspectors from a different division may insist that the grease trap must be removed.

An intradepartmental group currently meets monthly (the Customer Service Center Coordinating meeting) to coordinate customer service center operations. There is a need to either expand this group or to develop an interdepartmental group with responsibility for identifying and resolving differences between divisions with regard to enforcement of requirements. The group could also identify the most common types of inspection citations and other types of deficiencies and find methods to assist businesses in avoiding those problems, for example, through additional information or education related to the problem area. In addition, this group could take a lead in coordinating a program of continuous improvement as recommended in Goal 5.

- **Cross-Departmental Coordinator Position:** Explore creating a position that is accountable for making sure the full process – between the divisions and departments – is coordinated and operates smoothly, with responsibility for developing and steering ongoing improvements in the full process, not just within one division or discipline.

This position could also serve as a point of contact for business customers (an ombudsman role) when they are looking for “the person in charge” on an issue that may involve more than one department or have other issues requiring higher-level attention. Some business

customers expressed frustration that the City does not have “a boss,” someone they knew they could go to for resolution of issues.

- **Fully Realize the One-Stop Shop Concept:** As staffing levels and space planning allows, continue to work toward the goal of having all staff involved in plan reviews, inspections and licensing in one building, with a presence at the Development Review Customer Service Center, including Business Licensing and Environmental Health.
- **ELMS Opportunities to Improve Consistency:**
 - Improve consistency of information provided to business customers at the Customer Service Center by documenting in the new ELMS system all communications with a customer starting with the first visit to the Business Customer Service Center so that staff can check prior communications to ensure consistency.
 - With ELMS, all inspectors will have on-line access to inspection information from other divisions as well as their own. Inspectors should review all prior inspection reports for a particular business to make sure that directives are consistent with what has previously been communicated to the business.

GOAL 5: DELIVER BETTER CUSTOMER SERVICE AND PLAN FOR CONTINUOUS IMPROVEMENT

- **Training: Develop and Implement Two Types of Training:**

- 1) **Customer Service Training:** Assess training needs and provide an ongoing program of Customer Service Training for all City staff (including inspectors) who have direct customer contact.

“The Golden Rule:” Businesses shared that while they had many positive experiences, there were still too many times that they received less than desired treatment by staff and/ or inspectors and did not feel that they were treated as “customers.” Concerns about possible retaliation from inspectors was also expressed by some small business owners.

Additional training for City staff and inspectors on positive customer interactions would seem to be of benefit. It is acknowledged that customers can be disrespectful or difficult in their treatment of staff and, consequently, training should include skills in how to deal with difficult customers. It should be noted that Regulatory Services recently provided training through an outside vendor on customer service.

Employees Who “Know Their Stuff” and Apply Common Sense: Feedback from customers included comments that inspectors do not know or inaccurately interpret code provisions. Knowledgeable business owners or contractors may be able to convince inspectors that a change is not required, while less informed businesses might simply comply.

For example, one business owner related that a fire inspector cited the business for not having fire panic hardware on a door, but the inspector failed to read the whole code section that allowed the existing door (a door that was consistent with the older look of the building) as long as the door was left unlocked during all business hours with a sign posted to that effect.

It is important for staff to be fully conversant in the applicable requirements and for the rules to be applied not to the “nth” degree but with reason and common sense.

Clear Explanations: As part of customer service training, ensure that the reasons for requirements are clearly explained to customers, also making it clear the source of the requirement: Is it a State law requirement? Metropolitan Council? Federal ADA requirement? Or City Charter or Ordinance? Complaints heard from customers during the listening sessions demonstrated a lack of understanding of why certain requirements were being imposed. City inspectors were being blamed for a lack of

flexibility when, for example, they were enforcing state or federal ADA requirements over which the City had no control.

2) **Train Employees to Help Businesses Get to “Yes:”**

Train development review staff on how they can provide suggestions of alternatives to customers so that they can approve of a plan instead just saying “no” to the proposal in front of them. It is understandable that staff may be reluctant to suggest alternatives out of concern due to liability or other concerns. Through training and development, however, guidelines can be provided to staff on how to help customers get to “yes” without going outside appropriate boundaries for City staff as regulators.

- **Plan for Continuous Improvement:** A work group with representatives from the involved departments and divisions, along with representatives from the City Attorney’s Office, as appropriate, should be formed with the goal of planning, coordinating and overseeing continuous improvements in the City’s business development review, approvals and licensing processes. This could be the same work group recommended under Goal 4 (see page 14).

Currently, each department and division works on innovation and process improvement, but without a group focused on continuous improvement in a coordinated or holistic way to assess the combined impact on businesses.

- **Develop Method to Seek Ongoing Customer Input for Development Review:** Develop a business advisory committee or other method for obtaining in-person feedback and advice from customers and a plan for acting on the suggestions received.

When it was first formed, Business Development Review had a business advisory group. While the group was disbanded several years ago, participants found it to be a useful resource.

A new group or model should be developed that provides for regular customer input and feedback from a representative and diverse group of business stakeholders.

Business Licensing has developed its own advisory group of neighborhood business associations that meets monthly. Business Licensing has found this to be a helpful resource to identify issues, vet new proposals and to communicate developments. There still appears to be a need and benefit to adding a broader development review advisory group or other solution that would provide for input from not only business owners, but developers, contractors and other stakeholders.

- **Measure Performance and Report Results:** Develop effective methods to monitor and measure the quality of customer service, satisfaction, timeliness and innovation.

Effective methods for assessing the quality of customer service and satisfaction need to be developed. Some business representatives expressed concern that complaints could lead to retaliation by inspectors. Thus, methods of obtaining feedback that ensure privacy to participants need to be developed.

These measures should be reflected in Results Minneapolis or similar reporting mechanisms.